

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SAKIE SCOTT,

Plaintiff,

v.

No. 08-cv-1457

ILLINOIS STATE MEDICAL INSURANCE
SERVICES, INC.,

Defendant.

Judge Zagel

Magistrate Judge Cox

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant, Illinois State Medical Insurance Services, Inc. ("ISMIS"), by its attorneys, and moves for a 31-day extension of time, to and including June 30, 2008, to answer or otherwise plead to the Amended Complaint of Plaintiff, Sakie Scott. In support of this Motion, Defendant states as follows:

1. On March 11, 2008, Plaintiff, acting *pro se*, filed a 71-paragraph Complaint alleging discrimination, harassment, retaliation, hostile work environment and unlawful discharge, which was never served on Defendant.
2. Plaintiff filed an Amended Complaint on May 5, 2008.
3. On May 5, 2008, Plaintiff sent a copy of the Amended Complaint to Defendant via Federal Express.
4. As a result, Defendant's responsive pleading, if properly served, is due on May 28, 2008.
5. The undersigned counsel have just recently been retained by Defendant and require additional time to investigate the numerous allegations of Plaintiff's lengthy Complaint

and to prepare a responsive pleading.

6. Accordingly, Defendant requests a 31-day extension to answer or otherwise plead to the Complaint.

7. This is Defendant's first request for an extension of time.

8. Plaintiff has agreed to this requested extension.

WHEREFORE, Defendant Illinois State Medical Insurance Services, Inc. requests that it be granted a 31-day extension of time, to and including June 30, 2008, to answer or otherwise plead to the Complaint of Plaintiff, Sakie Scott.

Respectfully submitted,

ILLINOIS STATE MEDICAL INSURANCE
SERVICES, INC.

By: s/ Megan J. Crowhurst
One of Its Attorneys

Edward C. Jepson, Jr., Bar No. 03127220
Megan Crowhurst, Bar No. 06289289
Vedder Price P.C.
222 North LaSalle Street
Suite 2600
Chicago, IL 60601-1003
(312) 609-7500
Dated: May 22, 2008

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing Agreed Motion for Extension of Time to Answer or Otherwise Plead were served on

Sakie Aneshia Scott
669 Clyde Avenue, #2N
Calumet City, IL 60409

by depositing the same in the U.S. mail, first-class postage prepaid, at 222 North LaSalle Street, Chicago, Illinois 60601-1003 by 5:00 p.m. on May 22, 2008.

s/Megan J. Crowhurst